

JDJ/mh

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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POORNIMA BALASUBRAMANIAN,

Plaintiff,

-against-

ALFONSO S. SEVERINO, UNION CITY MIRROR
AND TABLE CO., and UNION CITY MIRROR
AND TABLE CO., INC.,

Defendants.

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VERIFIED ANSWER

ECF CASE

07-CV-8100

**DEFENDANTS DEMAND
TRIAL BY JURY**

Defendants, ALFONSO S. SEVERINO, UNION CITY MIRROR AND TABLE CO., and UNION CITY MIRROR AND TABLE CO., INC, by their attorneys, DOWNING & PECK, P.C., answering the verified complaint herein, respectfully sets forth and alleges as follows:

ANSWERING THE FIRST CAUSE OF ACTION

1. Denies knowledge and information sufficient to form a belief as to each and every allegation contained in paragraphs 1, and 13 of said complaint.
2. Admits each and every allegation contained in paragraphs 2, 3, 4, 5, 6, 9, 10, 11, and 12 of said complaint.
3. Denies knowledge and information sufficient to form a belief as to each and every allegation contained in paragraphs 7, 8, 19, and 20 of said complaint and refers all questions of law to the Court.
4. Denies each and every allegation contained in paragraphs 14, 15, 16, 17, 18 and 21 of said complaint.

AS AND FOR A FIRST CAUSE OF ACTION

5. The plaintiff's damages must be reduced in accordance with the comparative negligence of plaintiff.

AS AND FOR A SECOND CAUSE OF ACTION

6. The plaintiff has failed to name a necessary party.

AS AND FOR A THIRD CAUSE OF ACTION

7. The plaintiff's damages, if any, must be reduced in accordance with her
8. failure to mitigate damages.

AS AND FOR A FOURTH CAUSE OF ACTION

9. The Court lacks personal jurisdiction over the defendants due to improper service of process.

Dated: New York, New York
September 19, 2007

DOWNING & PECK, P.C.

BY: /s/
JOHN M. DOWNING, JR. - 2518
Attorneys for Defendants
5 Hanover Square - 20th Floor
New York, New York 10007
212-514-9190

TO: O'Donnell & McLaughlin
Attorney for Plaintiff
390 Manor Road
Staten Island, New York 10314
718-816-0247